

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PEOPLE OF THE STATE OF ILLINOIS,)
)
)
Plaintiff,)
)
)
v.) No. 08 CR 00148
)
)
STEVEN CROSS,) Judge Matthew Kennelly
)
)
Defendant.)

**AGREED AND UNOPPOSED MOTION FOR
LEAVE TO ISSUE SUBPOENAS FOR DEPARTMENTAL POLICIES**

NOW COMES Defendant, Steven Cross, by the undersigned counsel, requesting that this Court grant to him leave to issue subpoenas to the Illinois State Police and Chicago Police Department requesting any and all policies, procedures, and general orders regarding how to conduct a vehicle search incident to arrest and an inventory search of a vehicle following an arrest. The purpose of issuing these subpoenas is to obtain inventory policies to determine whether any search conducted in this case complied with the dictates of Florida v. Wells, 495 U.S. 1 (1990).

WHEREFORE Defendant respectfully requests that this Honorable Court grant attorney Greenberg leave to issue subpoenas for the departmental policies, and for such further relief as this Court deems just.

Respectfully Submitted,

s/Steven A. Greenberg
Attorney for Defendant

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